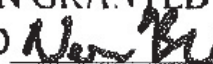


SHER TREMONTE LLP

February 16, 2021

**VIA ECF**

Hon. Vernon S. Broderick  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007-1312  
BroderickNYSDChambers@nysd.uscourts.gov

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 2/17/2021

**Re: *United States v. Argenis Adames, et al.***  
Case No. 15 Cr. 796 (VSB)

Dear Judge Broderick,

We were recently appointed CJA counsel to investigate and prepare a petition for compassionate release on his behalf. In connection with that effort, we reached out to the U.S. Attorney's Office to request an updated criminal history report, which we need in order to prepare Mr. Adames's petition. Assistant U.S. Attorney Alex Rossmiller indicated that we should seek a court order directing him to produce an updated criminal history report, which he believes the U.S. Attorney's Office otherwise lacks the authority to provide to us. Accordingly, we respectfully request that the Court issue an order directing the U.S. Attorney's Office to immediately provide us with an updated criminal history report for Mr. Adames.

Respectfully submitted,

/s/ Michael Tremonte

Michael Tremonte  
Jennifer X. Luo

cc: All counsel of record (by ECF)